

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

IN RE: THERESA ANN WHITE-PRICE)
aka THERESA A WHITE-PRICE)
aka THERESA ANN PRICE)
)
SELECT PORTFOLIO SERVICING, INC.,)
AS SERVICING AGENT FOR U.S. BANK)
NATIONAL ASSOCIATION, AS TRUSTEE,)
AS SUCCESSOR-IN-INTEREST TO BANK)
OF AMERICA, NA, AS TRUSTEE, AS)
SUCCESSOR BY MERGER TO LASALLE)
BANK NA, AS TRUSTEE FOR THE HOLDERS))
OF THE CREDIT SUISSE SEASONED LOAN)
TRUST 2006-1 SEASONED LOAN TRUST)
2006-1 HOME EQUITY PASS-THROUGH)
CERTIFICATES, SERIES 2006-1,)
Creditor,)
)
vs.) CASE NO. 15-07365
) JUDGE CAROL A. DOYLE
THERESA ANN WHITE-PRICE aka)
THERESA A WHITE-PRICE aka)
THERESA ANN PRICE,)
Debtor)

OBJECTION TO CONFIRMATION OF DEBTOR'S CHAPTER 13 PLAN

Now comes Select Portfolio Servicing, Inc., as servicing agent for U.S. Bank National Association, as Trustee, as successor-in-interest to Bank of America, NA, as Trustee, as successor by merger to LaSalle Bank NA, as trustee for the holders of the Credit Suisse Seasoned Loan Trust 2006-1 Home Equity Pass-Through Certificates, Series 2006-1, by and through its attorneys, Pierce & Associates, P.C., and requests that Confirmation be denied, stating as follows:

1. On March 03, 2015 the debtor filed the instant bankruptcy petition under Chapter 13 of the Bankruptcy Code (11 U.S.C. Sec. 1301 et seq.)

2. Select Portfolio Servicing, Inc., as servicing agent for U.S. Bank National Association, as Trustee, as successor-in-interest to Bank of America, NA, as Trustee, as successor by merger to LaSalle Bank NA, as trustee for the holders of the Credit Suisse Seasoned Loan Trust 2006-1 Home Equity Pass-Through Certificates, Series 2006-1 services the mortgage lien on the real property commonly known as 2800 Tarpon Court, Homewood, IL 60430.
3. Paragraph E of the debtor's Chapter 13 Plan provides that the Chapter 13 Trustee shall pay Select Portfolio Servicing, Inc., as servicing agent for U.S. Bank National Association, as Trustee, as successor-in-interest to Bank of America, NA, as Trustee, as successor by merger to LaSalle Bank NA, as trustee for the holders of the Credit Suisse Seasoned Loan Trust 2006-1 Home Equity Pass-Through Certificates, Series 2006-1 \$36,711.00 over the life of the Chapter 13 Plan.
4. However, the actual filed and allowed pre-petition mortgage arrears of Select Portfolio Servicing, Inc., as servicing agent for U.S. Bank National Association, as Trustee, as successor-in-interest to Bank of America, NA, as Trustee, as successor by merger to LaSalle Bank NA, as trustee for the holders of the Credit Suisse Seasoned Loan Trust 2006-1 Home Equity Pass-Through Certificates, Series 2006-1 total \$44,685.56 which is greater than the amount provided for in Paragraph E of the debtor's Chapter 13 Plan.

5. Plan paragraph B(2)(b) and (c) of the debtor's Chapter 13 Plan impermissibly modifies the independent valid contractual rights of the mortgage holder pertaining to when and how costs of collection for post-petition obligations may be assessed, allowed, and/or reimbursed by the debtor under the plan. See, 11 U.S.C. Sec. 1322(b).
6. The debtor's Chapter 13 Plan, by not properly paying the allowed, secured Proof of Claim filed by Select Portfolio Servicing, Inc., as servicing agent for U.S. Bank National Association, as Trustee, as successor-in-interest to Bank of America, NA, as Trustee, as successor by merger to LaSalle Bank NA, as trustee for the holders of the Credit Suisse Seasoned Loan Trust 2006-1 Home Equity Pass-Through Certificates, Series 2006-1, impermissibly modifies the rights of Select Portfolio Servicing, Inc., as servicing agent for U.S. Bank National Association, as Trustee, as successor-in-interest to Bank of America, NA, as Trustee, as successor by merger to LaSalle Bank NA, as trustee for the holders of the Credit Suisse Seasoned Loan Trust 2006-1 Home Equity Pass-Through Certificates, Series 2006-1, which is secured only by a mortgage lien on the real estate which is the debtor's principal residence. 11 U.S.C. Sec. 1322(b)(2).
7. The debtor's Chapter 13 Plan, by not properly paying the allowed, secured, Proof of Claim filed by Select Portfolio Servicing, Inc., as servicing agent for U.S. Bank National Association, as Trustee, as successor-in-interest to Bank of

America, NA, as Trustee, as successor by merger to LaSalle Bank NA, as trustee for the holders of the Credit Suisse , does not "provide for the curing" of the pre-petition mortgage arrears of Select Portfolio Servicing, Inc., as servicing agent for U.S. Bank National Association, as Trustee, as successor-in-interest to Bank of America, NA, as Trustee, as successor by merger to LaSalle Bank NA, as trustee for the holders of the Credit Suisse Seasoned Loan Trust 2006-1 Home Equity Pass-Through Certificates, Series 2006-1. 11 U.S.C. Sec. 1322(b)(5).

8. A Proof of Claim "is deemed allowed, unless a party in interest objects" to it. 11 U.S.C. Sec 502.
9. No party in interest has filed an Objection to the Proof of Claim filed by Select Portfolio Servicing, Inc., as servicing agent for U.S. Bank National Association, as Trustee, as successor-in-interest to Bank of America, NA, as Trustee, as successor by merger to LaSalle Bank NA, as trustee for the holders of the Credit Suisse Seasoned Loan Trust 2006-1 Home Equity Pass-Through Certificates, Series 2006-1.
10. Select Portfolio Servicing, Inc., as servicing agent for U.S. Bank National Association, as Trustee, as successor-in-interest to Bank of America, NA, as Trustee, as successor by merger to LaSalle Bank NA, as trustee for the holders of the Credit Suisse Seasoned Loan Trust 2006-1 Home Equity Pass-Through Certificates, Series 2006-1 Se has incurred reasonable fees as a result of this objection.

WHEREFORE, Select Portfolio Servicing, Inc., as servicing agent for U.S. Bank National Association, as Trustee, as successor-in-interest to Bank of America, NA, as Trustee, as successor by merger to LaSalle Bank NA, as trustee for the holders of the Credit Suisse Seasoned Loan Trust 2006-1 Home Equity Pass-Through Certificates, Series 2006-1 Seasoned Loan Trust 2006-1 Home Equity Pass-Through Certificates, Series 2006-1 respectfully prays that Confirmation of the debtor's Chapter 13 Plan be denied, and for such other and further relief as this Honorable Court deems just.

Respectfully Submitted,
Select Portfolio Servicing, Inc.,
as servicing agent for U.S. Bank
National Association, as Trustee,
as successor-in-interest to Bank
of America, NA, as Trustee, as
successor by merger to LaSalle
Bank NA, as trustee for the
holders of the Credit Suisse
Seasoned Loan Trust 2006-1 Home
Equity Pass-Through Certificates,
Series 2006-1

/s/Kinnera Bhoopal
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